Drawings as originally filed. Amendments to the Drawings have been drawn from the Specification and Drawings as originally filed. Amendments to the Specification have been drawn from the Drawings as originally filed. New matter as described in 35 U.S.C. §132 has not been added to the Specification. The proposed changes should not, therefore, be objectionable. Accordingly, entry of these changes is hereby respectfully requested.

C. Specification Has Been Amended

1. The specification has been amended on page 24 on lines 24 and 26 to add the word -- vertical -- and the word -- vertically -- to specify the direction of movement of the movable pulley 158.

2. The movable pulley 158 is located within the throttle actuator housing 148 of the throttle actuator module 118. The vertical movement of the movable pulley 158 is supported by the vertical direction of movement of the pulley return springs 162 clearly shown in Figs. 3A to 3C. The pulley return springs 162 are directly secured between the top inside surface of the throttle actuator housing 148 and the movable axis 160 of the movable pulley 158 best shown in Fig. 3A. Please see Applicant's pending specification page 26, lines 17-24 for additional support.

3. Further, the movable axis 160 of the movable pulley 158 moves in a vertically-oriented sliding rail 184 as is clearly illustrated in Fig. 3C as originally filed.

4. Thus, the vertical movement of movable pulley 158 is clearly supported by Applicant's drawing Figs. and specification as originally filed. The Examiner is encouraged to make the amendment to the specification of record.

D. Drawing Figures Have Been Amended (37 C.F.R. §1.84)

1. The drawing Figs. have been amended. Fig. 3C has been amended to add the number -- 162 -- to identify the pair of pulley return springs utilized with the movable pulley 158.

2. The addition of the number -- 162 -- to Fig. 3C is clearly supported by the appearance of the number -- 162 -- on Fig. 3A and Fig. 3B as originally filed. The pulley return springs 162 are described on page 23, lines 17-24 of Applicant's specification as originally filed. Amendments to the drawings are drawn from the specification and drawings as originally filed and thus new matter has not been added.

3. A copy of Fig. 3C as originally filed (i.e., on Sheet 3 of 8) marked in red ink is enclosed herewith for the Examiner's consideration. It is respectively requested that the Examiner approve the proposed drawing change.

4. New drawing Figs. will be submitted upon Applicant's receipt of a notice of allowable subject matter in the pending application.

E. Invention as Claimed is Patentable

Applicant's invention is directed to an automated system for immobilizing a vehicle and method therefore typically employed in a motor vehicle for disabling the throttle and deploying the brake and clutch control systems after a theft of the vehicle has occurred. The invention includes a plurality of devices for monitoring a corresponding plurality of parameters of the vehicle and for generating the triggering signal. A central control microprocessor is employed for receiving and analyzing the plurality of parameters and for detecting the triggering signal. A throttle adjustable range actuator module is utilized for disabling the throttle of the vehicle upon detection of the triggering signal. Finally, a brake adjustable range actuator module is included for deploying the brakes to stop the vehicle. Additionally, a clutch adjustable range actuator module is included for deploying a manual clutch, if the vehicle is fitted with one, for preventing the wheels of the vehicle from being driven. The plurality of vehicle parameters monitored include the vehicle speed, status of an audio power supply and vehicle sound system,

state of external triggering devices, instructions imputed from a reset keypad, microprocessor control data received across a data link, and the state of a plurality of adjustable range actuator modules.

This advantageous design is defined in the present Specification and set forth in claims of varying scope, for example amended Claim 1 recites:

> 1. An automated system for immobilizing a vehicle comprising:
>
> first means for monitoring a plurality of parameters of said vehicle and for generating a triggering signal;
>
> a central control microprocessor for receiving said plurality of parameters and for detecting said triggering signal;
>
> a throttle adjustable range actuator module for disabling an accelerator pedal of said vehicle upon detection of said triggering signal from said microprocessor, said throttle actuator module including an electrically operated solenoid for positioning a vertically movable pulley to control the tension in an accelerator cable, wherein reduced tension in said accelerator cable disables said accelerator pedal without disabling the engine of said vehicle; and
>
> A brake adjustable range actuator module for deploying a braking system of said vehicle upon detection of said triggering signal from said microprocessor, said brake actuator module including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal of said vehicle, wherein increased tension in said wire cable depresses said brake pedal and deploys said braking

system to stop said vehicle.
(Emphasis added.)

F. Argument

1. Pagliaroli In View Of Adams - 35 U.S.C. §103

a. Claims 1-10, 13-14 and 19-20 have been rejected by the Examiner under 35 U.S.C. §103(a) as being unpatentable over Pagliaroli et al. in view of Adams.

b. The Examiner argued that Pagliaroli et al. disclose in Fig. 1 a system for remotely immobilizing a vehicle. The Examiner argued that Pagliaroli's system comprises a plurality of parameters including 12, 18, 20, 22, 24, 26 and 32 for generating a triggering signal and a control means 16 for receiving the plurality of parameters and for detecting a triggering signal. The Examiner then made of record that Pagliaroli et al. fail to (1) specify disclose the means for disabling the throttle of the vehicle upon detection of the triggering signal, and (2) to also deploy the brakes of the vehicle to stop the vehicle. The Examiner then cited Adams as disclosing an alert system for use in a vehicle wherein the throttle is disabled upon detection of a triggered signal from the control means 12 and also the brake is deployed to stop the vehicle. The Examiner then referred Applicant's attorney to column 4, lines 43-48 of Adams.

c. The Examiner then concluded that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify the system of Pagliaroli with that of Adams by disabling the throttle and deploying the brake to bring the vehicle to a stop since it would allow the alertness as well as control for preventing unsafe operation of the vehicle.

d. Pagliaroli et al purport to disclose a system for remotely disabling or enabling an automobile including a receiver that is activated by theft detection sensors when the automobile is stolen. Once activated, the receiver monitors the signal frequency range currently used to transmit mobile telephone

communications. Once the owner of the automobile discovers that the automobile has been stolen, the operator dials a predetermined telephone number corresponding to the receiver. The number is then transmitted from the signal towers of the mobile telephone network in use. The receiver receives the transmitted signal and compares it to a disabling code and an enabling code stored within the receiver. If the transmitted signal matches the disabling code, the automobile is disabled. Similarly, if the transmitted signal matches the enabling code, a disabled automobile will be enabled and can resume normal use. (See Pagliaroli et al., column 2, lines 43-57.)

e. Adams purports to disclose a safety alertness monitoring system for a vehicle which requires the operator to match a randomly generated alpha-numeric character pattern, consisting of a set of characters, presented at random intervals during normal operation of the vehicle. Failure to input the displayed characters via keyboard leads to an audible alarm. If the operator fails to respond to the audible alarm or an unacceptable number of consecutive alarms occur, the vehicle throttle is disabled and the braking system engaged. The system receives input from the vehicle speedometer and is capable of bringing the vehicle to a smooth controlled stop. The system also receives input from sensors that indicate when the vehicle is being remotely operated. The system is disabled when the vehicle is remotely operated.

f. Pagliaroli et al. in view of Adams individually or in combination fail to teach, disclose or intimate

> a throttle adjustable range actuator module for disabling an accelerator pedal of a vehicle upon detection of a triggering signal from a microprocessor, including <u>an electrically operated solenoid for positioning a vertically movable pulley to control the tension in an accelerator cable, wherein reduced tension in said accelerator cable disables said accelerator pedal without disabling the engine</u> of said vehicle or a brake adjustable range actuator module for deploying a braking

> system of said vehicle upon detection of said triggering signal from said microprocessor including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal of said vehicle, wherein increased tension in said wire cable depresses said brake pedal and deploys said braking system to stop said vehicle.

Each of these novel features are recited in Applicant's amended independent Claims 1 and 19. Each of these features recited above is important for enabling the adjusting of the tension in the accelerator cable and the controlling of the tension in the wire cable attached to the vehicle brake pedal.

g. At column 3, line 55, Pagliaroli discloses that the controlled features include the starter 20 and ignition system 22, each of which disable the vehicle engine. Applicant's independent Claims 1 and 19 both recite that the solenoid and vertically movable pulley control the tension in the accelerator cable to disable the accelerator pedal without disabling the engine of the vehicle.

h. Adams is directed to a train locomotive.

The Examiner argues that the brake and throttle of Adams are equivalent to Applicant's brake adjustable range actuator module and throttle adjustable range actuator module, respectively, since the brake and throttle of Adams are capable of being adjusted.

At column 3, lines 23-25, Adams discloses that the computer module 12 disables a throttle relay 22 and then activates the brake control valve 28 thereby engaging the wheel brake system 30. Pagliaroli in view of Adams fail to disclose the adjustment of a wire cable (via an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft) utilized to apply the brakes of the vehicle. Further, Pagliaroli in view of Adams fail to disclose the adjustment in the tension of the accelerator cable (via an electrically operated solenoid for positioning a vertically movable

pulley to control the tension in an accelerator cable) utilized to disable the accelerator pedal. Each of these features are recited in Applicant in amended Claims 1 and 19.

i. Applicant's amended Claim 6 recites that the audio control relay 110 is employed to disconnect the audio power supply 112 from the audio sound system 114 within a vehicle. See Applicant's disclosure at page 19, lines 1-5. The audio control relay 110 enables the local broadcast of a plurality of audio and sensory warnings to the unauthorized driver from a warning systems controller 116 mounted within the vehicle. (See Applicant's disclosure at page 20, lines 5-17 and 31-35 and page 21, line 1 to page 22, line 5 and Fig. 1.) The cited references fail to disclose this claimed feature.

j. The Examiner argued that Adams discloses in Fig. 1 a throttle adjustable range actuator 24 and a brake adjustable range actuator. The Examiner then concluded that it would have been obvious to one skilled in the art at the time of the invention to modify the system of Pagliaroli with the adjustable throttle and brake of Adams in order to accelerate and stop the system as needed. Adams discloses a locomotive personal alert system which serves as a safety alert monitoring system for the operation of the locomotive. Element 24 shown in Fig. 1 of Adams is labeled a throttle and at column 3 beginning with line 24 of Adams, the element 24 is also described as a throttle.

> Pagliaroli et al. in view of Adams fail to disclose a combination of structure including <u>an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal</u> for deploying the brakes of the vehicle.

Further, Pagliaroli in view of Adams fail to disclose

> an <u>electrically operated solenoid</u> for positioning a <u>vertically movable pulley</u> to control the <u>tension in an accelerator cable</u> utilized to disable the accelerator pedal without disabling the engine.

Each of these features are recited in Applicant in amended Claims 1 and 19. Each of the highlighted features above is important for adjusting the tension in the accelerator cable and controlling the tension in the wire cable attached to the vehicle brake pedal.

k. The Examiner argued that Adams discloses an element 22 considered as a solenoid operator connected to the throttle 24 as shown in Adams Fig. 1 and that it would have been obvious to modify Pagliaroli with the alleged solenoid operator as taught by Adams in order to control the operation of the throttle. At column 3, lines 23-24, Adams discloses element 22 as a throttle relay. As is well known in the art, a relay (whether a discrete or solid state element) serves to make or brake electrical contact in an electrical circuit. An electrically operated solenoid is an electromagnetic coil device than can cause translational movement of a member such as the movable piston 192 in the solenoid 190 shown in Applicant's Fig. 3A and described on page 25, line 14 to page 26, line 31. Applicant's solenoid 190 is normally energized and causes the movable piston 192 to position the movable pulley 158 in a vertical direction to ensure adequate tension in the accelerator cable 140 to enable the accelerator pedal 142 as shown in Applicant's Fig. 3A. Pagliaroli et al in view of Adams fails to disclose

> an <u>electrically operated solenoid</u> for positioning a <u>vertically movable pulley</u> to control the <u>tension in an accelerator cable</u> utilized to disable the accelerator pedal without disabling the engine.

Each of these features are recited in Applicant in amended Claims 1 and 19. Each of these features is important in adjusting the tension in the accelerator cable.

l. The Examiner argued that Pagliaroli in view of Adams made obvious Applicant's pending Claims 19 and 20. Applicant's amended Claim 19, in addition to reciting each of the elements not disclosed by the cited combination (i.e., electrically operated solenoid, vertically movable pulley, tension in

accelerator cable, an electrically operated motor, a plurality of gears, a threaded sliding bolt, and a rotatable threaded shaft) also recites a plurality of sensor switches positioned within said brake actuator module for limiting the travel of said threaded sliding bolt along said rotatable threaded shaft. The cited references fail to disclose the combination of structure. Applicant's amended Claim 20 recites a plurality of steps in a method not disclosed in the cited references. Those steps include muting a sound system located within a vehicle, activating a warning systems controller within a vehicle for enabling the broadcast of a plurality of audio and sensory warning messages, disabling an accelerator pedal of a vehicle by positioning a vertically movable pulley with an electrically operated solenoid for controlling the tension in an accelerator cable, and deploying the brakes of a vehicle to stop the vehicle by positioning a threaded sliding bolt along a rotatable threaded shaft using a motor and a plurality of gears for controlling the tension in a wire cable attached to a brake pedal.

m. Thus, based upon the above arguments, it would not have been obvious to one of ordinary skill in the art at the time of Applicant's invention to have modified the remotely controlled activated automobile disabling system of Pagliaroli et al. by substituting the throttle relay 22, brake controls 30, speedometer 14, and throttle 24 of Adams locomotive personal alert system for the corresponding elements of Pagliaroli et al. to make obvious Applicant's invention as claimed.

2. Pagliaroli In View Of Adams And Toohey

a. Claims 15 and 16 have been rejected by the Examiner under 35 U.S.C. §103(a) as being unpatentable over Pagliaroli et al. in view of Adams as applied to Claims 1, 10 above, and further in view of Toohey.

b. The Examiner made of record that Pagliaroli et al. disclose all of the limitations set forth in Applicant's

pending Claims 15 and 16 but fail to specifically disclose the controlling of the tension upon a wire cable connected to the brake pedal, and a sliding bolt along a rotatable threaded shaft operated by a motor and a plurality of gears. The Examiner then argued that Toohey discloses a brake control system that has a brake cable and holding gear. The Examiner then referred Applicant's attorney to the Toohey abstract.

c. The Examiner then concluded that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify the system of Pagliaroli et al. and that of Adams with the control of the tension upon the wire cable and having a sliding bolt along a rotatable threaded shaft by a motor and a plurality of gears in order to permit the brake pedal to be stoked a plurality of times to tension the brake cable as desired as allegedly taught by Toohey.

d. Toohey purports to disclose an improvement in parking brake controls for motor vehicle brake systems. The present invention describes multi-stoke parking brake control that includes a pulley connected to a parking brake cable and a brake pedal arranged to drive the pulley. The pulley has a large gear in mesh engagement with a driving pinion supported by the brake pedal and a holding pinion supported by the control housing. A one-way helical spring clutch drivingly interconnects the driving pinion and the pedal when the pedal is moved in a direction to tension the brake cable. A similar spring cable interconnects the holding pinion and the housing and functions to hold the gear and pulley in a brake applied condition. A release mechanism is arranged to release the second one-way helical spring clutch to permit the pulley and brake cable to move to a released position under the force of a release spring. The construction of a parking brake control permits the brake pedal to be stoked a plurality of times to tension the brake cable as desired.

e. Pagliaroli et al. in view of Adams and further

in view of Toohey individually or in combination fail to teach, disclose or intimate

> a throttle adjustable range actuator module for disabling an accelerator pedal of a vehicle upon detection of a triggering signal from a microprocessor, including an electrically operated solenoid for positioning a vertically movable pulley to control the tension in an accelerator cable, wherein reduced tension in said accelerator cable disables said accelerator pedal without disabling the engine of said vehicle or a brake adjustable range actuator module for deploying a braking system of said vehicle upon detection of said triggering signal from said microprocessor including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal of said vehicle, wherein increased tension in said wire cable depresses said brake pedal and deploys said braking system to stop said vehicle.

Each of these novel features are recited in Applicant's amended independent Claims 1 and 19. Each of these features is important in adjusting the tension in the accelerator cable and controlling the tension in wire cable attached to the vehicle brake pedal. Claims 15 and 16 have been canceled.

f. Toohey is limited to a parking brake construction (see Toohey column 1, lines 15-17 and column 5, lines 56-60) and does not relate to the braking system of the vehicle. Amended Claims 1 and 19 clearly recite that the electrically operated motor, plurality of gears, threaded sliding bolt and rotatable threaded shaft are employed to control the tension in a wire cable attached to a brake pedal of said vehicle. Fig. 6 of Applicant's pending application clearly demonstrates that the "braking pedal" recited in the claims is the hydraulic brake system of the vehicle. See Applicant's disclosure page 28, lines 15-21 referring to the "vehicle brakes". Also see page 5, lines 28-32, page 8, lines 28-33, and page 27, lines 23-35. At column 2, lines 11-15, Toohey states that

"The parking brake control 10 is designed to be installed

> in the passenger compartment of a motor vehicle with its brake pedal 12 situated where it may be depressed by a vehicle operator to tension a brake cable 14."

This statement clearly indicates that the tensioning of the brake cable 14 is completed by the vehicle operator (see Toohey column 5, lines 17-28) and not by a motor operated gear train controlled by a central control microprocessor as is recited in Applicant's amended Claims 1 and 19.

g. Toohey discloses a vacuum servo-motor 69 shown on Figs. 1, 2 and 4 and discussed at column 5, lines 41-43. The vacuum servo-motor is utilized to release tension in the parking brake cable 14, not to increase tension. At column 5, line 41, Toohey states that when it is desired to release the vehicle parking brake, the lever 66 shown clearly on Fig. 4 may be rotated manually by the vehicle operator or automatically by the application of vacuum to the servo-motor 69. Thus, Pagliaroli et al. in view of Adams and Toohey fails to disclose

> a brake adjustable range actuator module for deploying a braking system ... including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal of said vehicle, wherein increased tension in said wire cable depresses said brake pedal and deploys said braking system to stop said vehicle.

These features recited in Applicant's amended independent Claims 1 and 19 are important since they enable the tension in the accelerator cable to be adjusted and the tension in the wire cable attached to the vehicle brake pedal to be controlled. Further, these features are not disclosed in any of the references cited of record including Toohey. Since the combination of references do not teach, suggest or intimate these elements of structure, they cannot be deemed obvious under 35 U.S.C. §103(a).

h. In Figs. 1-3 and at column 2, lines 30-34, Toohey discloses a pulley 32 which includes a hub that is rotatably

supported on bushings 29 and 30. Pulley 32 disclosed by Toohey is not "vertically movable" as is recited in Applicant's amended independent Claims 1 and 19 as follows

> a throttle adjustable range actuator module for disabling an accelerator pedal of a vehicle upon detection of a triggering signal from a microprocessor, including an electrically operated solenoid for positioning a vertically movable pulley to control the tension in an accelerator cable.

It is an important feature that the movable pulley is "vertically movable" as is recited in Applicant's disclosure so that the movable piston of the solenoid can adjust the tension in the accelerator cable.

i. Thus, based upon the above arguments, it would not have been obvious to one of ordinary skill in the art at the time of Applicant's invention to modify the remotely activated automobile disabling system of Pagliaroli et al. and the locomotive personal alert system of Adams with the means for controlling the tension in the wire cable disclosed in the multi-stroke parking brake control of Toohey to make obvious Applicant's claimed invention.

3. Pagliaroli in View Of Adams And Gill

a. Claims 11-12 have been rejected by the Examiner under 35 U.S.C. §103(a) as being unpatentable over Pagliaroli et al. in view of Adams as applied to Claim 1 above, and further in view of Gill.

b. The Examiner made of record that Pagliaroli et al. and Adams fail to specifically disclose the means for deploying the clutch and comprising a clutch adjustable range actuator module. The Examiner then argued that Gill discloses that immobilization is achieved in the brake or clutch making reference to page 2, lines 18-20 of Gill.

c. The Examiner then concluded that it would have been obvious to one of ordinary skill in the art at the time of the

invention to modify the vehicle system of Pagliaroli et al. and that of Adams with the clutch system of Gill since it is well known to have a clutch in some vehicles for operation.

d. Gill purports to disclose a vehicle anti-theft system comprising a control means and a remote control means adapted for two-way communication, and a plurality of anti-theft devices which are activated by the control means in response to the presence of an intruder. Thus, the remote control means can activate the control means and thus the anti-theft devices and the control means can alert the remote control means to the presence of an intruder. The hydraulic braking system may have valves switchable by the user into a uni-directional or bi-directional mode. The former is used for parking or when starting on a hill since releasing the brake pedal will not disengage the brakes in this mode.

e. Pagliaroli et al. in view of Adams and further in view of Gill, individually or in combination, fail to teach, disclose or intimate

> a throttle adjustable range actuator module for disabling an accelerator pedal of a vehicle upon detection of a triggering signal from a microprocessor, including an electrically operated solenoid for positioning a vertically movable pulley to control the tension in an accelerator cable, wherein reduced tension in said accelerator cable disables said accelerator pedal without disabling the engine of said vehicle or a brake adjustable range actuator module for deploying a braking system of said vehicle upon detection of said triggering signal from said microprocessor including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal of said vehicle, wherein increased tension in said wire cable depresses said brake pedal and deploys said braking system to stop said vehicle.

Each of these novel features are recited in Applicant's amended independent Claims 1 and 19. Each of these features is important in adjusting the tension in the accelerator cable and controlling

the tension in wire cable attached to the vehicle brake pedal. Claim 12 has been canceled.

f. Gill discloses a brake or clutch system that requires vehicle operator participation to initiate operation of the vehicle anti-theft system. At page 2, lines 20-22, Gill states that

> "Thus when a valve is configured for uni-directional flow, on depression of for example, the brake pedal, fluid is made to flow towards the brakes ...." (Emphasis added.)

Further, at page 7, lines 9-11, Gill states

> "Thus, once unit 20 has been thus activated, when a user applies the brakes in conventional fashion, by depressing the brake pedal, fluid will be made to flow ...."

Each of these statements by Gill clearly indicates that his vehicle anti-theft system does not activate automatically but requires that the brake or clutch systems be operated by an operator, including an intruder. Further, nothing disclosed in Gill that when combined with Pagliaroli et al. and Adams discloses a throttle adjustable range actuator module or a brake adjustable range actuator module or a clutch adjustable range actuator module having the following features:

> a throttle adjustable range actuator module for disabling an accelerator pedal of a vehicle upon detection of a triggering signal from a microprocessor, including an electrically operated solenoid for positioning a vertically movable pulley to control the tension in an accelerator cable, wherein reduced tension in said accelerator cable disables said accelerator pedal without disabling the engine of said vehicle, or
>
> a brake adjustable range actuator module for deploying a braking system of said vehicle upon detection of said triggering signal from said microprocessor including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal of said vehicle, wherein increased tension in said wire cable depresses said brake

pedal and deploys said braking system to stop said vehicle, or

a clutch adjustable range actuator module for disengaging the clutch of said vehicle upon detection of said triggering signal from said microprocessor, said clutch actuator module including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a clutch pedal of said vehicle, wherein increased tension in said wire cable depresses said clutch pedal for deploying the clutch of said vehicle.

g. Thus, based upon the above arguments, it would not have been obvious to one of ordinary skill in the art at the time of Applicant's invention to modify the remotely activated automobile disabling system of Pagliaroli et al. in view of the locomotive personal alert system of Adams by using the clutch system of Gill to make obvious Applicant's claimed invention.

4. Pagliaroli et al. in view of Adams, Gill & Toohey

a. Claims 17 and 18 have been rejected by the Examiner under 35 U.S.C. §103(a) as being unpatentable over Pagliaroli et al. and Adams in view of Gill as applied to Claims 1, 11-12 above, and further in view of Toohey.

b. The Examiner argued that as to Applicant's pending Claims 17 and 18, the limitations have been discussed in the previous claims wherein Toohey further discloses that the clutch is interconnected to the brake pedal and therefore pending Claims 17 and 18 are rejected for the same reasons. The Examiner then referred Applicant's attorney to the abstract of Toohey.

c. The Examiner then concluded that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify the system of Pagliaroli et al. and the personal alert system of Adams in view of the vehicle anti-theft system of Gill with the multi-stroke parking brake control of Toohey to disclose all the claimed elements of the present

invention.

d. Toohey purports to disclose a multi-stoke parking brake control that includes a pulley connected to a parking brake cable and a brake pedal arranged to drive the pulley. The pulley has a large gear in mesh engagement with a driving pinion supported by the brake pedal and a holding pinion supported by the control housing. A one-way helical spring clutch drivingly interconnects the driving pinion and the pedal when the pedal is moved in a direction to tension the brake cable. A similar spring cable interconnects the holding pinion and the housing and functions to hold the gear and pulley in a brake applied condition. A release mechanism is arranged to release the second one-way helical spring clutch to permit the pulley and brake cable to move to a released position under the force of a release spring. The construction of a parking brake control permits the brake pedal to be stoked a plurality of times to tension the brake cable as desired.

e. Pagliaroli et al. and Adams in view of Gill and further in view of Toohey individually or in combination fail to teach, disclose or intimate

> a throttle adjustable range actuator module for disabling an accelerator pedal of a vehicle upon detection of a triggering signal from a microprocessor, including an electrically operated solenoid for positioning a vertically movable pulley to control the tension in an accelerator cable, wherein reduced tension in said accelerator cable disables said accelerator pedal without disabling the engine of said vehicle or a brake adjustable range actuator module for deploying a braking system of said vehicle upon detection of said triggering signal from said microprocessor including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal of said vehicle, wherein increased tension in said wire cable depresses said brake pedal and deploys said braking system to stop said vehicle, or

> a clutch adjustable range actuator module for disengaging the clutch of said vehicle upon detection of said triggering signal from said microprocessor, said clutch actuator module including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a clutch pedal of said vehicle, wherein increased tension in said wire cable depresses said clutch pedal for deploying the clutch of said vehicle.

Each of these novel features are recited in Applicant's amended independent Claims 1 and 14 or in amended Claim 11. Claims 17 and 18 have been canceled.

f. The abstract of the invention in Toohey refers to a "one-way helical spring clutch" drivingly interconnects the driving pinion and the pedal when the pedal is moved in a direction to tension the brake cable. A similar spring cable interconnects the holding pinion and the housing and functions to hold the gear and pulley in a brake applied condition.

g. At column 2 beginning with line 53, Toohey discloses a helical spring coil 48 that functions as a one-way clutch as shown in Figs. 1 and 4. The coil 48 is described as being snugly wound around the drum 41 at line 63 of column 2. Beginning with line 67 of column 2, it is noted that the projecting end 49 of coil 48 is anchored on the pedal 12, and thus the drum 41 and the driving pinion 43 will be fast with the pedal 12 in response to forces tending to rotate the driving pinion 43 in a counterclockwise direction. Beginning with line 9 of column 3, Toohey notes that when the driving pinion 43 and the drum 41 are rotated in a clockwise direction, the coil 48 will tend to unwind in response to any frictional engagement between these parts. Thus, the helical spring coil 48 and other similar coil springs function to tightly grip in response to forces in the counterclockwise direction and to unwind in response to forces in the clockwise direction. This action is what is described as a one-way clutch.

h. Notwithstanding the description of the coil 48 as a one-way clutch in the immediately preceding paragraph, the coil 48 is not related to the vehicle clutch assembly used in an automobile for the purpose of disengaging the clutch of said vehicle as is recited in Applicant's amended Claim 11. Consequently, neither Toohey nor the combination of Pagliaroli et al., Adams, Gill and Toohey teach, suggest or intimate the throttle adjustable range actuator module and the brake adjustable range actuator module recited in amended Claim 1 or the clutch adjustable range actuator module recited in amended Claim 11 as follows

> a throttle adjustable range actuator module for disabling an accelerator pedal of a vehicle upon detection of a triggering signal from a microprocessor, including an electrically operated solenoid for positioning a vertically movable pulley to control the tension in an accelerator cable, wherein reduced tension in said accelerator cable disables said accelerator pedal without disabling the engine of said vehicle, or
>
> a brake adjustable range actuator module for deploying a braking system of said vehicle upon detection of said triggering signal from said microprocessor including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a brake pedal of said vehicle, wherein increased tension in said wire cable depresses said brake pedal and deploys said braking system to stop said vehicle, or
>
> a clutch adjustable range actuator module for disengaging the clutch of said vehicle upon detection of said triggering signal from said microprocessor, said clutch actuator module including an electrically operated motor and a plurality of gears for positioning a threaded sliding bolt along a rotatable threaded shaft to control the tension in a wire cable attached to a clutch pedal of said vehicle, wherein increased tension in said wire cable depresses said clutch pedal for deploying the clutch of said vehicle.

i. Thus, based upon the above arguments, it would not have been obvious to one of ordinary skill in the art at the

time of Applicant's invention to modify the remotely activated automobile disabling system of Pagliaroli et al. in view of the locomotive personal alert system of Adams and the clutch system of Gill to include the one-way helical spring clutch coils of Toohey to make obvious Applicant's claimed invention.

G. Conclusion

1. In light of the above analysis, the cited references neither individually nor in combination teach, suggest or intimate the invention as recited in Applicant's amended pending Claims 1-3, 5-6, 11 and 19-20. Thus, Claims 1-3, 5-6, 11, 19-20 should be allowed and such action is earnestly solicited.

2. The prior art made of record and not relied upon but considered pertinent to Applicant's disclosure (i.e., Rapoport) has been reviewed and is not believed to anticipate or make obvious the claims of the present invention.

3. The Examiner is invited and encouraged to initiate a telephone conference with Applicant's attorney at the telephone number listed below if the Examiner believes that such a conference would expedite allowance of the pending claims. Telephone calls may be directed to John S. Christopher at (310) 470-9258.

Respectfully submitted,
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